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3/22/94

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

AMERICAN WASTE PROCESSING, LIMITED
MAYWOOD, ILLINOIS
ILD 000 716 894

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EPA Region	:	5
Site No.	:	ILD 000 716 894
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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the American Waste Processing, Limited (AWP), facility in Maywood, Cook County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

AWP conducts four operations: (1) it receives and stores drums of hazardous and nonhazardous materials, (2) it crushes aerosol cans and recovers their contents, (3) it shreds nonaerosol materials, and (4) it bulks liquids and ships them off site in tanker trucks.

The facility receives off-specification and unusable products primarily from industrial packaging facilities. Approximately 90 to 95 percent of these materials are personal hygiene products such as hairspray, shaving cream, and toothpaste. The facility also receives aerosol products such as rug shampoo and white wall cleaner for automobile tires.

Unusable materials arrive in drums or boxes. Aerosol cans are crushed in the Bottle and Can Crusher (SWMU 1) where their contents are accumulated in a sump in SWMU 1 and later taken off-site for fuel blending. Crushed cans are taken off-site for recycling. The facility also bulks solvents by vacuuming solvents from 55-gallon drums and consolidating the vacuumed solvents into tanker trucks. Nonaerosol containers and empty drums are shredded in the Shredding Machine (SWMU 5).

Currently, the facility routinely generates the following hazardous waste streams: bulked ignitable solvents (D001, D035, F001 through F005, U220, and U239); can crushing ignitable waste (D001 and D002); and characteristic corrosive and metal wastes and chlorinated solvents (D002, D004 through D011, F001, and F002). The facility also generates two nonhazardous waste streams consisting of wastewater and sludge, unusable products, and scrap metal. The facility previously generated a plating waste stream (F006) and secondary fuel contaminated with F001, F002, F003, F005, D001, D002, and D007.

The facility is currently occupied by three businesses which operate under American Waste, Inc.: AWP; American Waste Inc., also known as American Waste Haulers, Limited; and American Resource Recovery Limited. The facility's Part A permit application included the AWP area and a garage operated by American Waste Haulers.

AWP submitted a notification of Hazardous Waste Activity on August 14, 1980, as a generator and treatment and storage facility. AWP submitted a Part A permit application on October 10, 1980. This application listed process code T04 with a narrative explanation of "Roll Off box containers used for transferring wastes before recycling." No additional information was available. The application listed the following waste codes: D001, D002, D004 through D010, F001 through F009, and F012.

AWP submitted a Part A permit application for the Bottle and Can Crusher (SWMU 1) on February 8, 1983. On May 6, 1988, Illinois Environmental Protection Agency (IEPA) required the facility to submit its Part B permit application. On November 3, 1988, AWP submitted a Part A permit application with the part B Permit application. This application listed three container storage areas: Hazardous Waste Storage Area (SWMU 2), Flammable Waste Storage Area (SWMU 3), and Nonhazardous Waste Storage Area (SWMU 6). This application also listed three treatment units: The Bottle and Can Crusher (SWMU 1), Shredding Machine (SWMU 5), and a pug mill. According to the facility, the pug mill was never constructed.

IEPA denied the facility's RCRA Part B permit application and Part B permit application revision on January 10, 1990, and January 25, 1991, respectively. According to facility representatives, the next Part B application submittal was due November 15, 1993.

The facility occupies approximately one acre in an industrial, commercial, and residential area of Maywood, Illinois. Maywood has a population of about 27,000 people. The facility began operations in 1981. Prior to 1981, a plating machinery manufacturer operated at the facility. No additional information was available on operations at the facility. The facility has approximately 20 employees. The facility is currently regulated as an interim status treatment and storage facility.

The former Loading and Unloading Area (SWMU 4) was removed in November 1984. The Former USTs were removed in 1986. AWP submitted a closure plan on September 2, 1986. In January

1986, the facility was cited for operating two units not on the Part A application: the Former Loading and Unloading Area (SWMU 4) and the Former Underground Storage Tanks (USTs) (SWMU 8). IEPA required that the facility submit a closure plan for these units. The plan was approved on October 26, 1986. During closure of the units, elevated concentrations of volatile organic compounds and metals were detected in soil and groundwater. IEPA found the report inadequate and required that additional groundwater monitoring be conducted at the facility. IEPA did not regard the facility's closure activities as sufficient. AWP submitted a closure plan modification in July 1993 and is awaiting a response from IEPA.

Contamination was found in soil and in the perched groundwater layer during closure activities at SWMUs 4 and 8. Five compounds were found in shallow monitoring wells at levels exceeding drinking water standards: trichloroethane, vinyl chloride, 1,2-dichloroethane, 1,1,2-trichloroethane, and 2,4,6-trichlorophenol. Methylene chloride, acetone, and total petroleum hydrocarbons were found in soil samples at two wells. AWP's consultant prepared a report on the site investigation. This report concluded that limited concentrations of contaminants were detected in the perched water table, which is isolated from the deeper aquifers underlying the facility. The report also concluded that soil contaminants were located in shallow soil layers and that contaminant levels did not exceed regulatory limits. At the time of the VSI, IEPA had not responded to this report.

PRC identified the following eight solid waste management units at the facility:

1. Bottle and Can Crusher
2. Hazardous Waste Storage Area
3. Flammable Waste Storage Area
4. Former Loading and Unloading Area
5. Shredding Machine
6. Nonhazardous Waste Storage Area
7. Staging Area
8. Former Underground Storage Tanks (UST)

PRC identified no areas of concern at the facility.

The potential for release to groundwater, surface water, air, and on-site soils for SWMUs 1, 2, 3, 5, and 7 is low. SWMU 1 is equipped with fire controls and filters to control emissions. SWMUs 2, 3, and 7 consist of a 12-inch-thick, bermed concrete pad. Drums are stored closed and are on pallets.

SWMU 7 manages consumer products which would have small concentrations of hazardous constituents. SWMU 5 is on concrete and also manages consumer products.

The potential for release to on-site soils from SWMU 6 is low to moderate. The potential for release to groundwater, surface water, and air from SWMU 6 is low. During the VSI, PRC observed cracks in the concrete at the unit. PRC could not determine the depth of the cracks or if the cracks would allow contaminants to reach on-site soils under the unit.

The nearest surface water body, the Des Plaines River, is 1.5 miles east of the facility and is used for recreational purposes. Lake Michigan, about 4 miles east of the facility, is used as a source of agricultural, municipal, and industrial water. Facility access is controlled by a 5-foot-high fence on the south and east. The facility is occupied from Sunday night until Friday evening. Additional security is provided by burglar and fire alarms. Facility buildings control access on the north and west.

[redacted]

PRC recommends the facility seal the cracks at SWMU 6. PRC also recommends IEPA continue with closure approval at SWMUs 4 and 8. PRC recommends no further action for the remaining SMWUs.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the American Waste Processing, Limited (AWP), facility (EPA Identification No. ILD 000 716 894) in Maywood, Cook County, Illinois. The PA was

completed on September 20, 1993. PRC gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA), National Oceanic and Atmospheric Administration (NOAA), U.S. Geological Survey (USGS), and from EPA Region 5 RCRA files. The VSI was conducted on September 21, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified eight SWMUs and no AOCs at the facility.

The VSI is summarized and 11 of the 13 inspection photographs taken are included in Appendix A. The photographs have been renumbered and thus do not correspond to the photograph numbers in the VSI field notes in Appendix B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

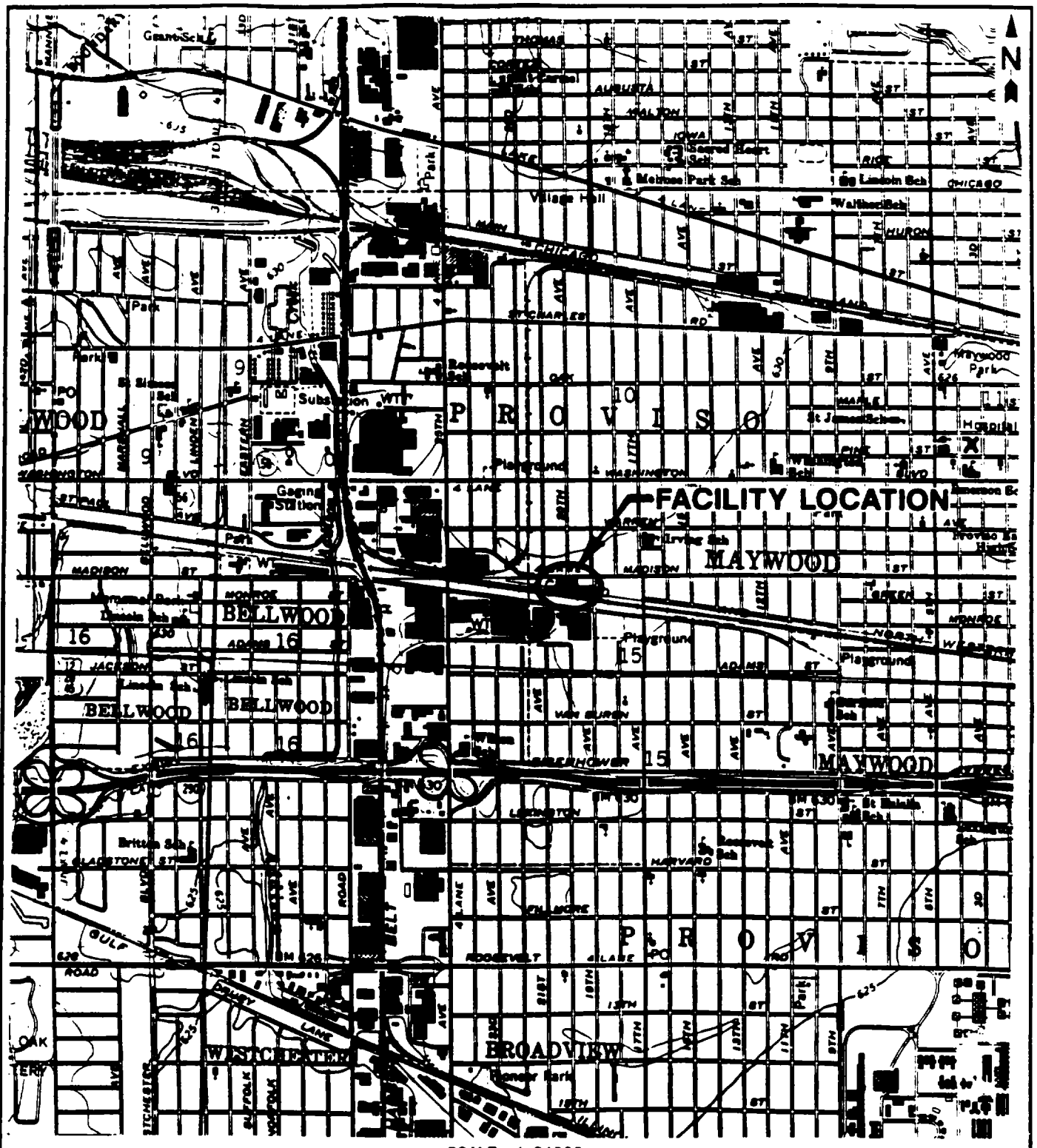
The AWP facility is located at 2010 West Madison Street in Maywood, Cook County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°52'45"N and longitude 87°51'40"W). The facility occupies approximately one acre in an industrial, commercial, and residential area. The AWP facility consists of a roofed area, where waste storage and some waste management operations take place; an office building; laboratory; garage; and parking lot.

The facility is bordered on the north by a residential area, on the west by Rossi Furniture Warehouse, on the south by Sargent Catering, and on the east by Harold's Auto Repair and American Resource Recovery.

2.2 FACILITY OPERATIONS

AWP conducts four operations: (1) it receives and stores drums of hazardous and nonhazardous materials, (2) it crushes aerosol cans and recovers their contents, (3) it shreds nonaerosol materials, and (4) it bulks liquids and ships them off site in tanker trucks.

The facility receives ignitable solvents and characteristic corrosive and metal waste and chlorinated solvents from off-site generators. The facility receives off-specification and unusable products primarily from industrial packaging facilities. Approximately 90 to 95 percent of these materials are personal hygiene products such as hairspray, shaving cream, and toothpaste. The facility also receives aerosol products such as rug shampoo and white wall cleaner. The facility occasionally receives nonhazardous wastewater and sludge from off-site generators; these wastes are stored at the Nonhazardous Storage Area (SWMU 6) and later are transported off-site.



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE: 1" = 2,000'

SOURCE: MODIFIED FROM USGS,
BERWYN, ILLINOIS, QUADRANGLE, 1963
(PHOTOREVISED 1972 and 1980)
ELMHURST, ILLINOIS, QUADRANGLE, 1963
(PHOTOREVISED 1972 and 1980)
HINSDALE, ILLINOIS, QUADRANGLE, 1963
(PHOTOREVISED 1972 and 1980)
RIVER FOREST, ILLINOIS, QUADRANGLE, 1963
(PHOTOREVISED 1972)

QUADRANGLE LOCATION

AMERICAN WASTE PROCESSING, LIMITED
MAYWOOD, ILLINOIS

FIGURE 1

FACILITY LOCATION

ENVIRONMENTAL MANAGEMENT, INC.

AWP-LM.DWG - 10/28/93 - MB 309-R0503/0192

The facility receives the following wastes in 55-gallon drums from off-site: ignitable solvents (D001, D035, F001 through F005, U220, and U239), characteristic corrosive and metal wastes and chlorinated solvents (D002, D004 through D011, F001, and F002), and nonhazardous wastewater and sludge. These wastes are unloaded and stored at the Flammable Waste Storage Area (SWMU 3), Hazardous Waste Storage Area (SWMU 2), and the Nonhazardous Waste Storage Area (SWMU 6) respectively. Compatible materials are vacuumed into tank trucks for transport and off-site disposal. AWP also receives drums of off-specification and unusable aerosol cans which are processed in the Bottle and Can Crusher (SWMU 1). Crushing aerosol cans generates a can crushing ignitable waste stream (D001 and D002) which is transported off-site for disposal. The facility also receives nonaerosol unusable product which is processed in the shredding machine generating an unusable product waste stream. AWP also generates a scrap metal stream from crushing aerosol cans and RCRA-empty drums.

The facility receives aerosol cans in 55-gallon drums which are unloaded onto the Staging Area (SWMU 7). The drums are typically at the Staging Area (SWMU 7) for one day. The aerosol cans are unloaded at the Bottle and Can Crusher (SWMU 1) where the cans are cut open. The can propellent is expelled through a stack at the unit and the ignitable waste is accumulated in a 300-gallon tank. The can is put on a conveyor to a crusher and into a roll-off box. The ignitable solvents (D001 and D002) are vacuumed into a tanker truck for transport off-site. The cans are shipped off-site as scrap metal.

The facility began operations in 1981. Prior to 1981 a plating machinery manufacturer operated at the facility. No additional information was available on prior operations at the facility.

AWP operated the Former USTs (SWMU 7), consisting of one 4000-gallon and one 6000-gallon steel UST from 1983 until 1986. The tanks were used to manage secondary fuels. According to IEPA records, the tanks managed secondary fuel contaminated with F001, F002, F003, and F005 wastes. Waste rinse-water from decontamination of the tanks was identified as D007, D002, and D001. The source of the hazardous waste in the tanks was never identified.

2.3 WASTE GENERATION AND MANAGEMENT

This section describes waste generation and management at the AWP facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

The facility is currently permitted by IEPA to receive and generate hazardous wastes with the following codes: D001, D002, D004 through D011, D018, D035, D039, D040, F001 through F009, F012, U002, U031, U054, U057, U080, U112, U117, U140, U159, U161, U210, U211, U220, U226, U228, and U239 (AWP 1980b; 1988; and 1991). The facility currently generates the following hazardous waste streams: bulked ignitable solvents (D001, D035, F001 through F005, U220, and U239); can crushing ignitable waste (D001 and D002); and characteristic corrosive and metal wastes and chlorinated solvents (D002, D004 through D011, F001, and F002). The facility also generates a nonhazardous waste stream consisting of wastewater and sludge, and unusable products and scrap metal. The facility previously generated a plating waste stream (F006) and a contaminated secondary fuel waste stream.

According to the facility, records were not kept of the wastes managed at the Loading and Unloading Area (SWMU 4). The facility, therefore, proposes that all waste streams, except the secondary fuel waste stream, that were managed at the facility were managed at that unit.

AWP bulks ignitable solvents (D001, D035, F001 through F005, U220, and U239) received from off-site generators. The drums are initially taken to the Staging Area (SWMU 7). The drums are placed in the Flammable Waste Storage Area (SWMU 3). The solvents are vacuumed into a tanker truck and taken off-site by American Waste Haulers Limited (AWH) to Environmental Waste Resources, Inc. (EWR), or Industrial Fuels and Resources for fuel blending. The solids remaining in the drums are consolidated and sent to Marine Shale for incineration. The facility generated 206,000 gallons of ignitable solvent waste in 1992.

TABLE 1

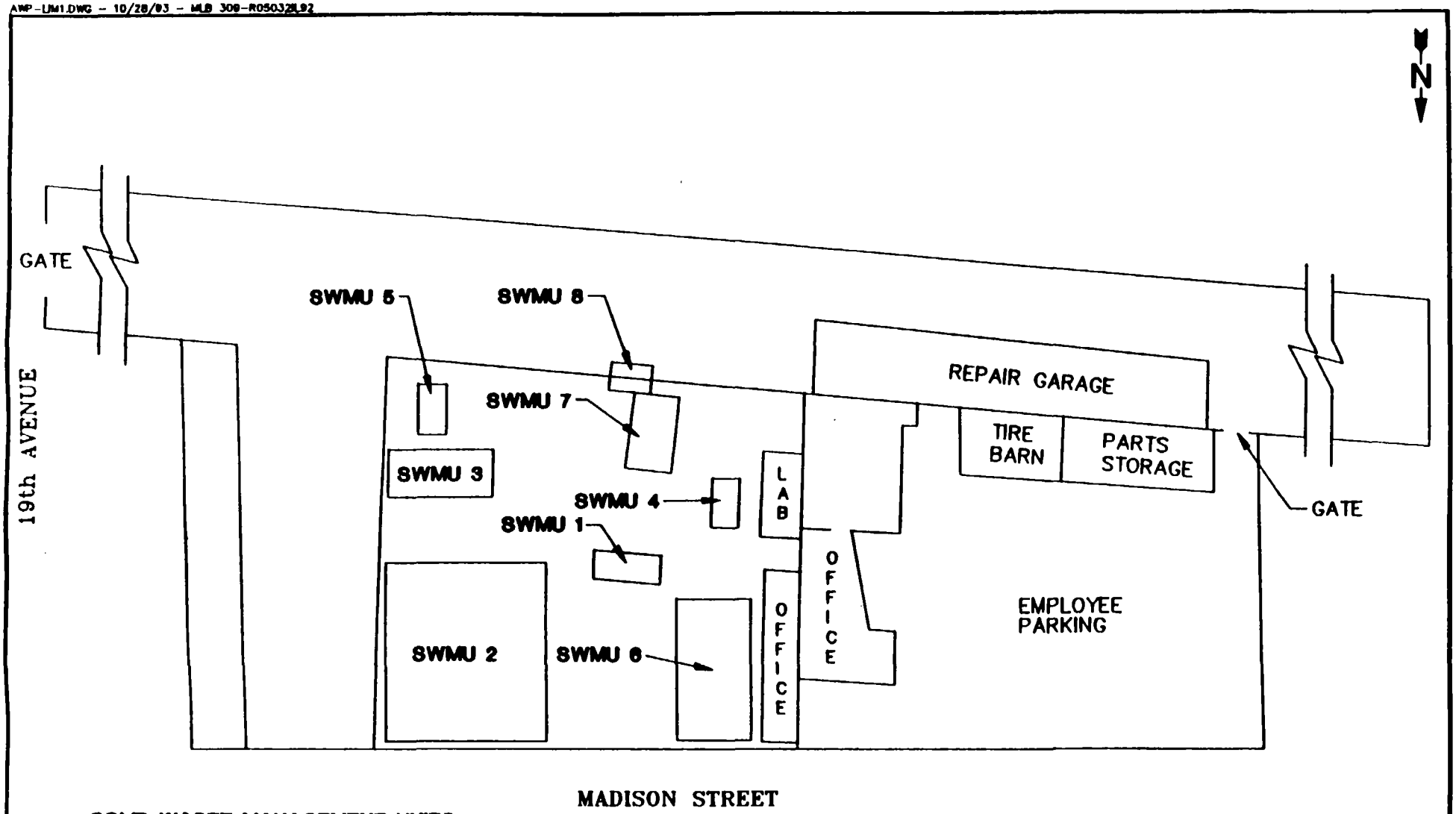
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Bottle and Can Crusher	Yes	Active; treats hazardous waste
2	Hazardous Waste Storage Area	Yes	Active; manages hazardous waste received from off site
3	Flammable Waste Storage Area	Yes	Active; manages hazardous waste received from off site
4	Former Loading and Unloading Area	Yes	Inactive since November 1984; undergoing RCRA closure
5	Shredding Machine[b]	Yes	Active; manages nonhazardous waste
6	Nonhazardous Waste Storage Area[b]	Yes	Active; manages nonhazardous waste
7	Staging Area	No	Active; manages hazardous waste for less than 90 days
8	Former Underground Storage Tanks (UST)	Yes	Inactive since 1986; undergoing RCRA closure

Notes:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

[b] Included on Part A and Part B permit applications even though unit does not manage hazardous waste.



SOLID WASTE MANAGEMENT UNITS

SWMU 1 BOTTLE AND CAN CRUSHER
SWMU 2 HAZARDOUS WASTE STORAGE AREA
SWMU 3 FLAMMABLE WASTE STORAGE AREA
SWMU 4 FORMER LOADING AND UNLOADING AREA
SWMU 5 SHREDDING MACHINE
SWMU 6 NONHAZARDOUS WASTE STORAGE AREA
SWMU 7 STAGING AREA
SWMU 8 FORMER UNDERGROUND STORAGE TANKS (UST)

30' 0 30' 60'
SCALE: 1" = 60'

SOURCE: MODIFIED FROM AWP 1990

AMERICAN WASTE PROCESSING, LIMITED
MAYWOOD, ILLINOIS

FIGURE 2

FACILITY LAYOUT

ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Bulked ignitable solvents/D001, D035, F001 through F005, U220, and U239	Consolidating solvents received from off site	3, 4, and 7
Can crushing ignitable waste/D001 and D002	Crushing aerosol cans	1 and 4
Characteristic corrosive and metal waste and chlorinated solvents/D002, D004 through D011, F001, and F002	Managing waste from off site	2, 4, and 7
Wastewater and sludge/NA	Managing waste from off site	4, 6, and 7
Unusable product/NA	Shredding unusable product	4, 5, and 7
Scrap metal/NA	Crushing cans and shredding drums	1, 4, and 5
Plating waste/F006	Consolidating product from off site	2, 4, and 7
Secondary fuel contaminated with F001, F002, F003, F005, D001, D002, and D007	unknown	8

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

Can crushing ignitable waste (D001 and D002) is generated when aerosol cans are placed in the Bottle and Can Crusher (SWMU 1). The waste is accumulated in the sump at SWMU 1 and is vacuumed into a tanker truck and taken off site to EWR for fuel blending. AWP generated about 118,000 gallons of this waste in 1992.

Characteristic corrosive and metal wastes and chlorinated solvents (D002, D004 through D011, F001, and F002) are received in 55-gallon drums from off-site generators. The drums are unloaded at the Staging Area (SWMU 7) and taken to the Hazardous Waste Storage Area (SWMU 2) for periods of less than two weeks. These wastes are taken off site by AWH to Adams Center Landfill for stabilization and landfilling. AWP generated about 1,330 gallons of this waste in 1992.

Nonhazardous wastewater and sludge are received in 55-gallon drums from off-site facilities. These wastes are unloaded at the Staging Area (SWMU 7) and later taken to the Nonhazardous Waste Storage Area (SWMU 6). According to facility representatives, these waste streams are received infrequently. The nonhazardous wastewater and sludge are sent to Land and Lakes Landfill.

The nonhazardous unusable product waste stream is generated when the facility receives unusable products from off site. These products consist of personal hygiene products which are unloaded at the Staging Area (SWMU 7). The products are taken to the Shredding Machine (SWMU 5) and shredded. The unusable product hazardous waste stream is accumulated in the roll-off box under the Shredding Machine. Liquids are sent to Metal Working Lubricants in Indianapolis, Indiana.

Scrap metal (nonhazardous) is generated at the facility from crushing aerosol cans and shredding empty drums. Scrap metal from crushed cans are accumulated in the roll-off box at the Bottle and Can Crusher (SWMU 1). Scrap metal from shredded RCRA empty drums are accumulated in the roll-off box at the Shredding Machine (SWMU 5). This waste is transported off-site by AWH to Cozzi Iron and Steel for recycling. The facility generates about 20 cubic yards of this waste per month.

The facility formerly generated a plating waste stream (F006) received from and generated by off-site generators. The plating waste (F006) would be shipped in drums and unloaded either at the Staging Area (SWMU 7) or Loading and Unloading Area (SWMU 4). The waste would then be stored at the

Hazardous Waste Storage Area (SWMU 2) and taken off site by AWH to Adams Center Landfill for stabilization and landfilling.

The facility generated a contaminated secondary fuel stream (F001, F002, F003, F005, and D001, D002, and D007) at the Former USTs (SWMU 8) when the unit was removed. There are no records of the process which generated this stream.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the facility.

On July 1, 1987, a fire occurred at the Bottle and Can Crusher (AWP 1987). The fire control system at the unit did not activate properly allowing the fire to continue. The materials burned were identified as about 100 gallons of alcohol and deodorant. No injuries were reported and all water used to extinguish the fire was contained by the diking system at the facility. The water was collected and taken to EWR.

During closure of the Former Loading and Unloading Area (SWMU 4) and the Former Underground Storage Tanks (SWMU 8), volatile organic compounds (VOC) and metals were detected in soil and groundwater samples. A subsurface contamination evaluation was conducted at the facility by Professional Service Industries, Inc. (PSI). Six shallow (12 to 20 feet below ground surface [bgs]) and four deep (50 to 61.5 feet bgs) monitoring wells were installed (PSI 1990). Soil borings were drilled and soil samples were collected. Eight contaminants were detected in the shallow groundwater samples. Five were found in the shallow monitoring wells at levels exceeding drinking water standards: trichloroethane, vinyl chloride, 1,2-dichloroethane, 1,1,2-trichloroethane, and 2,4,6-trichlorophenol. Methylene chloride, acetone, and total petroleum hydrocarbons were found in shallow soil samples at two well borings. The report concluded that concentrations of contaminants were detected at levels exceeding IEPA drinking water standards in the perched water table, which is isolated from the deeper aquifers underlying the facility. The report also concluded that soil contaminants were located at shallow layers and that contaminants did not exceed IEPA regulatory limits for UST remediations (PSI 1990).

In March 1992, Versar, Inc. (Versar), took additional soil boring and installed an additional monitoring well. Versar concluded that the contamination under the site was confined to the upper perched water zone which is not used as a drinking water source (Versar 1992).

2.5 REGULATORY HISTORY

AWP submitted a notification of hazardous waste activity on August 14, 1980, as a generator and treatment and storage facility (AWP 1980a). AWP submitted a Part A permit application on October 10, 1980 (AWP 1980b). This application listed process code T04 with a narrative explanation of "Roll Off box containers used for transferring wastes before recycling." No additional information, such as the SWMU described, was available. The application listed the following waste codes: D001, D002, D004 through D010, F001 through F009, and F012 (AWP 1980b).

On February 8, 1983, AWP submitted a revised Part A permit application to include the Bottle and Can Crusher (SWMU 1). This application listed a process code of T04 and a capacity of 10,000 cubic yards of D001 waste per year (AWP 1983).

On May 6, 1988, IEPA requested the facility's Part B permit application (IEPA 1988b). On November 3, 1988, AWP submitted a Part A permit application with the Part B permit application (AWP 1990). This application listed three container storage areas: Hazardous Waste Storage Area (SWMU 2), Flammable Waste Storage Area (SWMU 3), and Nonhazardous Waste Storage Area (SWMU 6). This application also listed three treatment units: the Bottle and Can Crusher (SWMU 1), Shredding Machine (SWMU 5), and a pug mill (AWP 1990). According to the facility, the pug mill was never constructed.

IEPA denied the facility's RCRA Part B permit application and revised application on January 10, 1990, and January 25, 1991, respectively (IEPA 1990a and 1991a). According to facility representatives, the next Part B application submittal is due November 15, 1993.

On September 9, 1988, AWP submitted a notification of hazardous waste activity to add the following waste codes: D011, U002, U031, U054, U057, U080, U112, U117, U140, U159, U161, U210, U211, U220, U226, U228, and U239 (AWP 1988). AWP submitted a notification of hazardous

waste activity on April 30, 1991, adding waste codes D011, D018, D035, D039, and D040 and waste activity "marketing-to-burner" (AWP 1991).

AWP has had RCRA noncompliance in the past. IEPA conducted compliance evaluation inspections in 1981, 1983, 1986, 1987, 1989, 1990, and 1992 (IEPA 1981, 1983, 1989a, 1989b, 1990b, and 1992a). During these inspections the facility was cited for lacking a waste analysis plan, having an inadequate contingency plan and training program, not conducting inspections of container storage areas, not inspecting tank levels, not having an adequate evacuation plan, having an inadequate operating record, failing to maintain adequate aisle space, and storing wastes not on the facility's Part A permit application.

AWP signed a Consent Agreement and Final Order, dated May 7, 1981, with EPA (EPA 1981). This consent order addressed the following violations cited in 1981: lack of a waste analysis plan, an inadequate inspection schedule and log, inadequate training records, lack of fire alarms, and an inadequate contingency plan. AWP also signed a Consent Agreement and Final Order with EPA, Docket Number V-W-84-R-056, on December 7, 1984, for inadequate financial assurance violations (EPA 1984).

In January 1986, the facility was cited for operating two units not on the Part A permit application: the Former Loading and Unloading Area (SWMU 4) and the Former USTs (SWMU 8) (IEPA 1991c). The Former Loading and Unloading Area (SWMU 4) was removed in November 1984. The former USTs were removed in 1986. IEPA required the facility submit a closure plan for these units, which had already been removed (IEPA 1991d). AWP submitted a closure plan for both units on September 2, 1986. The plan was approved on October 26, 1986 (IEPA 1986). During closure of the units, elevated concentrations of volatile organic compounds and metals were detected in soil and groundwater. IEPA found the report inadequate and required additional groundwater monitoring at the facility (see Section 2.4) (IEPA 1991b). IEPA did not regard the facility's closure activities as sufficient (IEPA 1991d). AWP submitted a closure plan modification in July 1993 (Versar 1993) and is awaiting a response from IEPA. The facility is currently in compliance except for the outstanding issue of operating two units not on the Part A permit application (IEPA 1992b).

The facility is currently regulated as a transfer station, a generator, and an interim status treatment and storage facility. AWP treats and generates hazardous waste when crushing aerosol cans (D001 and D002) in the Bottle and Can Crusher (SWMU 1). AWP acts as a storage facility when wastes are received from off site for treatment. The facility operates under IEPA special waste supplemental permit number 1987-216-SP (IEPA 1988a).

The facility is not required to have a National Pollutant Discharge Elimination System Permit or any city discharge permits.

The facility has individual operating air permits for the Shredding Machine (SWMU 5) and the Bottle and Can Crusher (SWMU 1). According to the facility representative, the facility has received two odor complaints since it began operations in 1981.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

2.6.1 Climate

The climate in Cook County is continental with cold winters and warm summers. The average daily temperature is 49.2 °F. The lowest average daily temperature is 21.4 °F in January. The highest average daily temperature is 73 °F in July (NOAA 1990).

The total annual precipitation for the county averages 33.34 inches (NOAA 1990). The mean annual lake evaporation is 30 inches. The 1-year, 24-hour maximum rainfall recorded in the area is 2.4 inches (NOAA 1979).

The prevailing wind is from the west-southwest. Average wind speed is highest in April at 12 miles per hour (NOAA 1990).

2.6.2 Flood Plain and Surface Water

The facility is not located in a flood plain. The nearest surface water body, the Des Plaines River, is approximately 1.5 miles east of the facility and is used for recreational purposes. The Des Plaines River discharges to the Mississippi River approximately 300 miles away. Lake Michigan is located 4 miles east of the facility and is used for municipal, industrial, and recreational water.

Surface water runoff at the facility flows into sewers on Madison Street that discharge to the Chicago Metropolitan Water Reclamation District treatment facility.

2.6.3 Geology and Soils

Soils in the facility area are typical of the dense Wisconsin Stage glacial tills present in this region. Specifically the facility lies in the Wheaton Morainal Province, and the sediments are part of the Tinley Drift or Moraine, which is described as a gray clayey till consisting of clays and silts. Glacial deposits consisting predominately of brown and gray silty clays and clayey silts are present from the surface to depths varying from 45.5 to 63 feet (PSI 1990).

The glacial deposits are underlain by Silurian system dolomites, specifically, the Niagran Series, which are underlain by the Alexandrian series. These formations exhibit a regional slope towards the east. However the rock subsurface at the facility has a localized slope towards the southwest. Studies of regional geology show that the Silurian system is underlain by the Maquoketa shale and dolomites of the Ordovician system. Major water supply aquifers occur below the Maquoketa shale aquitard (PSI 1990).

2.6.4 Groundwater

In 1989, a geologic site characterization at the facility revealed perched water levels below the facility at 15 to 30 feet bgs. The water levels stabilized at 40 to 60 feet bgs. The indicated gradient of this perched water zone was 0.044 toward the southwest. However, groundwater flow at the facility is generally to the east. The volume of perched water was insufficient for sampling.

Groundwater occurs in three bedrock aquifer systems below the facility: the shallow Silurian dolomite, the Cambrian-Ordovician aquifer system, and the Mount Simon Aquifer. These three aquifer systems are separated on the basis of hydrogeologic properties and source of recharge to the systems (PSI 1990).

In the Silurian dolomite, groundwater occurs in joints and fissures. The water-yielding properties of the Silurian dolomite are not consistent across the Chicago area due to the heterogenous occurrence of these joints and fissures (PSI 1990).

The Maquoketa shale acts as a barrier between the shallow Silurian dolomite and the Cambrian-Ordovician aquifer system. Area wells are cased along the extent of the Maquoketa Shale (PSI 1990).

Below the Maquoketa shale lies the Cambrian-Ordovician aquifer system. This system consists, in descending order, of the Galena-Platteville unit, the Glenwood-Saint Peter unit, the Prairie du Chien formation, the Trempealeau unit, the Franconia unit, and the Ironton-Galesville unit (PSI 1990).

2.7 RECEPTORS

[redacted]

The facility occupies approximately one acre in an industrial, commercial, and residential area. Maywood has a population of approximately 27,000 people (Rand McNally 1990). The facility has approximately 20 employees. The facility is bordered on the north by a residential area, on the west by Rossi Furniture Warehouse, on the south by Sargent Catering, and on the east by Harold's Auto Repair and American Resource Recovery. Facility access is controlled by a 5-foot-high cyclone fence surrounding the facility on the south and east. The facility is occupied from Sunday night until Friday evening. Additional security is provided by burglar and fire alarms. Facility buildings control access on the north and west.

No sensitive environments are located within two miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eight SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1 **Bottle and Can Crusher**

Unit Description: This unit is outdoors, in a roofed area, and covers approximately 1,000 square feet. It is used to crush cans carrying aerosol products. Cans are fed into the unit by a conveyor. In the unit, the cans are cut open, and their contents are emptied into a 350-gallon plastic-lined steel sump beneath the unit's concrete base. Propellants are expelled through a stack equipped with two mist impinging filters. Once emptied, the cans are crushed and deposited in a 30-cubic-yard roll-off box at the unit.

Date of Startup: This unit began operation in 1980 or 1981.

Date of Closure: This unit is active.

Wastes Managed: This unit manages ignitable (D001) and corrosive (D002) wastes from crushing aerosol cans.

Release Controls: The sump is equipped with a high-level alarm. The crusher is equipped with fire control equipment. The unit rests on a 12-inch-thick reinforced concrete pad. The pad has a 6-inch berm on the east and south sides, a brick wall on the west side, and a concrete block wall on the north side. Propellent is expelled through a stack equipped with two mist impinging filters.

History of Documented Releases: On July 1, 1987, the unit had a fire when the fire control equipment did not function properly. Contaminated water was contained by the facility's berms and sumps.

Observations: The unit was not operating at the time of the VSI. The facility representative explained that the unit was temporarily shut down because the high-level alarm was not operating properly. PRC observed some viscous stains near the unit (see Photographs No. 1 and 2).

SWMU 2 **Hazardous Waste Storage Area**

Unit Description: This unit is located outdoors, in an area covered by a roof, at the northwest side of the facility. It consists of a 12-inch-thick, reinforced concrete pad that covers about 2,600 feet. The unit is divided into 5 storage lanes and five aisles. Each lane and aisle are 5 feet wide.

Date of Startup: This unit began operation around 1980.

Date of Closure: This unit is active.

Wastes Managed: This unit manages drums containing characteristic corrosive and metal waste and chlorinated solvents (D002, D004 through D011, F001, and F002). This unit formerly managed plating waste (F006).

Release Controls: The unit consists of a 12-inch-thick, reinforced concrete pad. The pad is surrounded by a 6-inch berm on the east and south sides, a brick wall on the west side, and a concrete block wall on the north side. The concrete pad slopes to a 500-gallon steel sump in the concrete pad near the unit.

History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed one unlabeled drum at the unit. According to the facility representative, this drum contained caustic used to clean the floors. PRC did not observe any cracks in the unit. PRC observed minor discolorations on the pad (see Photograph No 3).
SWMU 3	**Flammable Waste Storage Area**
Unit Description:	This unit consists of an outdoor, roofed area that covers about 270 square feet. The base of the unit consists of 12-inch-thick, reinforced concrete. The unit manages flammable waste in drums.
Date of Startup:	This unit began operations in 1980.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit manages bulked ignitable solvents (D001, D035, F001 through F005, U220, and U239) in 55-gallon drums.
Release Controls:	The unit's base is a 12-inch-thick, reinforced concrete pad. The pad is surrounded by a 6-inch berm on the east and south sides, a brick wall on the west side, and a concrete block wall on the north side. The concrete pad is sloped to a 500-gallon steel sump (see Photograph No. 4).
History of Documented Releases:	No releases have been documented from this unit.
Observations:	PRC observed 26 overpacked drums received from off site and labeled with waste codes of D001, D018, D035, U002, and U220. PRC also observed 19 drums labelled F003. The drums rested on pallets. PRC

did not observe any signs of spills or leaks at the unit at the time of the VSI (see Photograph No. 4).

SWMU 4 **Former Loading and Unloading Area**

Unit Description: This unit consisted of an outdoor, roofed concrete dock, approximately 22 feet wide and 24 feet long. The dock sloped from the floor of the pad to a total depth of approximately 4 feet bgs along its north wall. The walls and floor of the unit were constructed of reinforced concrete that was about 12 inches thick. The unit was used to unload closed drums from trailers. According to the facility representative, drums were quickly moved from the dock to a drum storage area. According to IEPA, solidification of F-listed and heavy metal wastes occurred at this unit (IEPA 1991d). No additional information was available on this unit.

Date of Startup: This unit began operation around August 1983.

Date of Closure: This unit was removed around November 1984. AWP is currently trying to complete RCRA closure of this unit.

Wastes Managed: According to the facility, records were not kept of the wastes managed at the Loading and Unloading Area (SWMU 4). The facility, therefore, proposes that all waste streams that were received at the facility from August 1983 until November 1984 were managed at that unit. These wastes included all the wastes in Table 2 except for the contaminated secondary fuel waste stream.

Release Controls: The unit was constructed of 12-inch-thick concrete.

History of Documented Releases: AWP collected soil and groundwater samples during its attempt to clean close the unit. VOCs and metals were detected in soil and groundwater samples. However, subsequent investigations have indicated that contamination in the area is sporadic, and no migration trail has been observed (PSI 1990; Versar 1992).

Observations: This unit has been removed and currently consists of a concrete pad. PRC observed puddles left by heavy rains in the unit's former location (see Photograph No. 5).

SWMU 5 **Shredding Machine**

Unit Description: This unit is outdoors and covers about 250 square feet. The unit consists of a steel shredding machine and a 30-cubic-yard roll-off box that rests on a concrete pad below the shredding machine.

Date of Startup: This unit began operation around 1987.

Date of Closure: This unit is active.

Wastes Managed: This unit shreds containers of unusable nonhazardous product and RCRA empty drums that formerly contained hazardous waste. This unit also manages scrap metal from shredded drums.

Release Controls: The unit rests on concrete and is partially surrounded on three sides by a concrete dike .

History of Documented Releases: No releases have been documented from this unit.

Observations:	PRC observed some rainwater on the concrete pad at the time of the VSI. PRC did not observe any signs of spills or leaks (see Photographs No. 6 and 7).
SWMU 6	**Nonhazardous Waste Storage Area**
Unit Description:	This unit is outdoors and consists of an approximately 1700-square foot, roofed concrete pad where drums of nonhazardous waste are stored. The pad is divided into four storage lanes and five aisles. Drums are stored two abreast in each lane. The unit holds a total of 130 drums.
Date of Startup:	This unit began operation around 1980.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages drums of nonhazardous wastewater and sludge. At the time of the VSI, the unit was managing drums containing nonhazardous oil filters, which belonged to American Resource Recovery.
Release Controls:	The unit's base consists of a 12-inch-thick reinforced concrete pad. The pad is surrounded by a 6-inch berm on the east and south sides, a brick wall on the west side, and a concrete block wall on the north side. The unit slopes to a 500-gallon steel sump.
History of Documented Releases:	No releases have been documented from this unit.
Observations:	PRC observed about 120 labeled drums of nonhazardous waste in the unit at the time of the VSI. According to the facility representative these drums contained used oil filters belonging to American Resource

Recovery. PRC observed some cracks in the concrete, but could not determine if the cracks extended through the concrete (see Photographs No. 8 and 9).

SWMU 7 **Staging Area**

Unit Description: This unit is outdoors and consists of a 50- by 25-foot concrete pad where drums are unloaded. According to facility representatives, drums remain in this unit for no more than 24 hours. The drums are then taken to the appropriate unit for storage, consolidation, or processing.

Date of Startup: This unit began operation around 1985.

Date of Closure: This unit is active.

Wastes Managed: This unit manages all wastes received from off site at the facility. These wastes generally include bulked ignitable solvents (D001, D035, F001 through F005, U220, and U239); can crushing ignitable waste (D001 and D002); characteristic corrosive and metal wastes and chlorinated solvents (D002, D004 through D011, F001, F002); nonhazardous wastewater and sludge, and unusable product (nonhazardous). This unit formerly managed plating waste (F006).

Release Controls: Drums rest on wooden pallets on a 12-inch-thick reinforced concrete pad. The pad is surrounded by a 6-inch berm on the east and south sides, a brick wall on the west side, and a concrete block wall on the north side. The unit slopes to a 500-gallon steel sump.

History of Documented Releases: No releases have been documented from this unit.

Observations:	PRC observed 12 drums containing D001 waste and 48 drums containing aerosol cans. The facility representative stated that the backup of drums was caused by a malfunction of the Bottle and Can Shredder (SWMU 1). PRC did not observe any signs of spills or leaks at the unit (see Photograph No. 10).
SWMU 8	**Former USTs**
Unit Description:	The unit consisted of two mild steel USTs with a wall thickness of 0.1625 inches. UST 1 had a diameter of 5 feet, a length of 27 feet, and a capacity of 4,000 gallons. The top of this tank was approximately 3 feet bgs. UST 2 had a diameter of 6 feet, a length of 30 feet, and a capacity of 6,000 gallons. The top of this tank was approximately 2 feet bgs. Sand and gravel backfill surrounded both USTs. According to AWP, the tanks were intended to be used for storage of secondary fuels. No records are available on the actual use of the tanks (Versar 1993). According to IEPA the units managed secondary fuel contaminated with F001, F002, F003, and F005. Waste rinse-water from decontamination of the tanks was identified as D007, D002, and D001. IEPA required these tanks to be closed (IEPA 1991d).
Date of Startup:	This unit was installed in 1983 (Versar 1993).
Date of Closure:	The unit was removed in 1986. AWP has conducted closure activities at the unit which have not been approved by IEPA. AWP submitted a closure plan modification in July 1993 (Versar 1993).
Wastes Managed:	This unit managed secondary fuels. According to IEPA, the tanks managed secondary fuel contaminated with F001, F002, F003, and F005 wastes. Waste rinse-water from decontamination of the tanks was identified by AWP as D007, D002, and D001.

Release Controls:	The unit had no release controls.
History of Documented Releases:	AWP collected soil and groundwater samples during an attempt to clean close the unit. Volatile organics and metals were detected in the soil and groundwater samples. However, subsequent investigations have indicated that contamination in the area is sporadic, and no migration trail has been observed.
Observations:	This area is now covered with concrete. PRC found no signs of the Former USTs (see Photograph No 11).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eight SWMUs and no AOCs at the AWP facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Bottle and Can Crusher**

Conclusions: The unit is located outdoors, in a roofed area, and covers approximately 1,000 square feet. Aerosol cans are cut open in the unit and the contents are emptied into a 350-gallon plastic-lined steel sump beneath a 12-inch thick, bermed, reinforced concrete pad equipped with a fire control system. The sump is equipped with a high-level alarm that alerts the operator when the level in the sump is too high. Propellent is expelled through two mist impinging filters on the unit's stack. In 1987, a fire occurred at the unit. The current potential for release to groundwater, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 2 **Hazardous Waste Storage Area**

Conclusions: This unit is located outdoors, in a roofed area, and manages 55-gallon drums of chlorinated hydrocarbons, acids, and caustics. The potential for release to groundwater, surface water, air, and on-site soils is low. Drums are stored on a 12-inch-thick reinforced concrete pad that is surrounded by a 6-inch berm

on two sides and walls on the other two sides. The concrete pad slopes to a 500-gallon steel sump. Drums were stored closed during the VSI.

Recommendations: PRC recommends no further action for this unit.

SWMU 3 **Flammable Waste Storage Area**

Conclusions: This unit is outdoors, in a roofed area, that covers about 270 square feet. The unit manages flammable waste in 55-gallon drums. The potential for release to groundwater, surface water, air, and on-site soils is low. The drums are stored on a 12-inch-thick reinforced concrete pad that is surrounded by a 6-inch concrete berm on two sides and walls on the other two sides. The pad slopes to a 500-gallon steel sump. Drums were stored closed or placed in overpack drums at the time of the VSI.

Recommendations: PRC recommends no further action for this unit.

SWMU 4 **Former Loading and Unloading Area**

Conclusions: This unit was outdoors and consisted of a roofed concrete dock. The walls and floor of the unit were constructed of approximately 12-inch-thick, reinforced concrete. The unit was used to unload closed drums from trailers. According to the facility, drums were quickly moved from the dock to a drum storage area. According to IEPA, solidification of F-listed and heavy metal wastes occurred at this unit. IEPA required that the unit undergo RCRA closure. The unit was removed around November 1984, and the area is now covered with concrete.

The potential for release to surface water and air is low. No waste is currently stored at the unit.

The potential for release to groundwater and on-site soils cannot be determined. Soil and groundwater sampling conducted during clean closure of the unit indicated elevated concentrations of VOCs and metals in soil and groundwater. Subsequent investigations have indicated that contamination in the area is sporadic, and no migration trail has been observed.

Recommendations: PRC recommends IEPA continue with the closure approval process for this unit.

SWMU 5 **Shredding Machine**

Conclusions: This unit is outdoors and consists of a shredding machine and a 30-cubic-yard roll-off box on a concrete pad. The potential for release to groundwater, surface water, air, and on-site soils is low. The machine shreds containers of nonhazardous personal hygiene products and is located on a concrete pad. The pad is surrounded by a concrete dike on three sides.

Recommendations: PRC recommends no further action for this unit.

SWMU 6 **Nonhazardous Waste Storage Area**

Conclusions: The unit is outdoors and consists of an approximately 1700-square foot covered area. Drums of nonhazardous wastewater and sludge are stored on concrete. The potential for release to groundwater, surface water, and air is low. Drums rest on a 12-inch-thick, reinforced concrete pad. The unit is surrounded by a perimeter dike or concrete walls and slope to a 500-gallon steel sump. Drums were stored closed during the VSI.

The potential for release to on-site soils is low to moderate. PRC observed some cracks in the concrete at the time of the VSI, but could not determine how deep these cracks were.

Recommendations: PRC recommends the facility seal the cracks and determine if the cracks allowed a release to occur from the unit.

SWMU 7 **Staging Area**

Conclusions: This unit is outdoors and consists of a 50- by 25-foot concrete area. Drums are unloaded from trucks and stored in this unit before they are taken to the appropriate unit for storage, consolidation, or processing. The potential for release to groundwater, surface water, air and on-site soils is low. The drums are kept at the unit for no more than 24 hours. The drums rest on pallets on concrete so that leaks can be spotted; drums were kept closed during the VSI.

Recommendations: PRC recommends no further action for this unit.

SWMU 8 **Former USTs**

Conclusions: This unit consisted of two steel USTs with capacities of 4,000 and 6,000 gallons. According to AWP, the tanks were intended to be used for storage of secondary fuels. According to IEPA, the tanks managed secondary fuel contaminated with F001, F002, F003, and F005 wastes. Rinse water from decontamination of the tanks was identified by AWP as containing D007, D002, and D001 wastes.

The potential for release to surface water and air is low. The tanks and materials in them have been removed. The nearest surface water body, the Des Plaines River, is 1.5 miles east of the facility.

A release to on-site soils and groundwater may have occurred from this unit. During an attempt to clean close the unit, volatile organics and metals were detected in soil and groundwater samples. Subsequent investigations have indicated that contamination in the area is sporadic and no migration trail has been observed.

Recommendations: PRC recommends IEPA continue with the closure approval process for this unit.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Bottle and Can Crusher	1980 or 1981 to present	Fire occurred in 1987	None
2. Hazardous Waste Storage Area	1980 to present	No	None
3. Flammable Waste Storage Area	1980 to present	No	None
4. Former Loading and Unloading Area	1983 to 1984	During an attempt to obtain clean closure, concentrations of VOCs and metals were detected in soil and groundwater samples. Subsequent investigations have indicated that contamination in the area is sporadic and no migration trail has been observed.	IEPA should continue with closure approval for the unit.
5. Shredding Machine	1987 to present	No	None
6. Nonhazardous Waste Storage Area	1980 to present	Cracks in concrete	Seal cracks and determine if a release to on-site soils occurred.
7. Staging Area	1985 to present	No	None

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
8. Former USTs	1983 to 1986	During an attempt to obtain clean closure, concentrations of VOCs and metals were detected in soil and groundwater samples. Subsequent investigations have indicated that contamination in the area is sporadic and no migration trail has been observed.	IEPA should continue with closure approval activities.

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APPENDIX A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

(Seven Pages)

VISUAL SITE INSPECTION SUMMARY

American Waste Processing, Limited
2010 West Madison Street
Maywood, Illinois 60153
ILD 000 716 894

Date:	September 21, 1993
Primary Facility Representative:	Joseph Strosnik, Director of Corporate Planning and Development
Representative Telephone No.:	(708) 681-3999
Inspection Team:	Cathy M. Collins, PRC Environmental Management, Inc. (PRC) Shin Ahn, PRC
Photographer:	Shin Ahn
Weather Conditions:	Cloudy; calm; about 65° F; rained the previous evening
Summary of Activities:	The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 10:55 a.m. PRC observed the following areas: Bottle and Can Crusher (SWMU 1); Hazardous Waste Storage Area (SWMU 2); Flammable Waste Storage Area (SWMU 3); Shredding Machine (SWMU 5); Nonhazardous Waste Storage Area (SWMU 6); and Staging Area (SWMU 7). PRC also observed the former locations of the Former Loading and Unloading Area (SWMU 4) and Former Underground Storage Tanks (SWMU 8). The tour concluded at 11:55 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 12:05 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: North Date: 9/21/93
Description: Bottle and Can Crusher; opened doors show unit's filters; sump is located below this unit

Photograph No. 2 Location: SWMU 1
Orientation: Northwest Date: 9/21/93
Description: Bottle and Can Crusher; crusher and stack are on the right; roll-off box is on the left

Photograph No. 3 Location: SWMU 2
Orientation: North Date: 9/21/93
Description: Hazardous Waste Storage Area; drum on left contains caustic cleaner used for cleaning floors; sump is located in the foreground.

Photograph No. 4 Location: SWMU 3
Orientation: East Date: 9/21/93
Description: Flammable Waste Storage Area; drums are stored on wooden pallets; overpack drums were received from off site

Photograph No. 5 Location: SWMU 4
Orientation: West Date: 9/21/93
Description: Former Loading and Unloading Area; puddles are the result of heavy rains from the previous evening

Photograph No. 6 Location: SWMU 5
Orientation: East Date: 9/21/93
Description: Shredding Machine; roll-off box is under the machine; puddle is the result of heavy rains the previous evening

Photograph No. 7
Orientation: North
Description: Shredding Machine.

Location: SWMU 5
Date: 9/21/93

Photograph No. 8 Location: SWMU 6
Orientation: North Date: 9/21/93
Description: Nonhazardous Waste Storage Area; drums contain used oil filters; note cracks in concrete

Photograph No. 9 Location: SWMU 6
Orientation: East Date: 9/21/93
Description: Nonhazardous Waste Storage Area; note cracks in concrete

Photograph No. 10
Orientation: West
Description: Staging Area; drums are on pallets

Location: SWMU 7
Date: 9/21/93

Photograph No. 11
Orientation: West
Description: Former Underground Storage Tanks

Location: SWMU 8
Date: 9/21/93

APPENDIX B

VISUAL SITE INSPECTION FIELD NOTES

(12 Sheets)

AMERICAN WASTE, INC. (708) 681-3999
AMERICAN WASTE PROCESSING, LTD FAX: (708) 681-5583
AMERICAN RESOURCE RECOVERY, LTD. (800) 841-6900

Joseph A. Strosnik
DIRECTOR
CORPORATE PLANNING & DEVELOPMENT

AMERICAN WASTE

P.O. BOX 306 • 2010 W. MADISON STREET • MAYWOOD, IL 60153

(E3)

PROCESSING

WOOD

TE

American Waste Haulers Inc. EPA ID
Hauling HAULING
American Waste
Processin

THIN THIN
CATHY M COLLINS
NORTH RESIDENTIAL
EAST HAROLD'S AUTO REPAIR
CLOUDY CALM
ABOUT 65°F
JOSEPH A. STROSNIK
DIRECTOR
CORPORATE PLANNING &
DEVELOPMENT

American Resource Recovery LTD
NOT REGULATED
Field Service
Division

American Waste Proceing. LTD
3 Company's
occupy Property

American Waste Inc.
= Hauler - Legal
Pseudonym.
Total county
5.5 acres
AWP occupies
< 1 acre

(84)

AWP - referred to as "PAD"

4 Operations

① STORE Drums H+NH
② Process Aerosol Cans
③ Shred non Aerosol Materials
④ Bulk Liquids and ship off in Tank TRUCKS

Operation began in 1981.

PRIOR TO 1981 BUILDING WAS SOME SORT OF Plating Machine

led to believe this area was a fill area from the Chicago Area

Formerly there was a Railroad track along the east side of the facility

Approximately 1 shift per day 5 days per week

(85)

(86)

Can store up to 5-40 drums by permit

Hazardous Non hazardous

+ Storage length 2 weeks

Bring in Containers comprised of drums & boxes

To aerosol can machine pumptime product to pump Can to shedding machine & recycled

(87)

product incinerated

Box

Drums Recycled & shredded

PROPELLENT IS EXPELLED

95% - 90% Personal hygiene products hair spray shaving cream Toothpaste

Rug Shampoo, White Wall Cleaner

(88)

Shredding Machine

Shreds Non-aerosol containers

Shredding Machine also shreds RCRA empty drums

Bulking - 55 gallon liquid is vacuumed and material is shipped as a bulk shipment

11/15/13 Most Recent Part B is due

(89)

Very Small transfer station

When waste is generated it goes on roll-off or tanker sucker from sump under aerosol can machine.

Hazardous waste 160,000 gallons
80,000 gal residue from aerosol can
80,000 gallon from drums + cans

(90)

Non hazardous less than 100,000 pounds

Currently run at 6 gallons of liquid per drum
↳ Derived from mass balance

Cans are mistaken
Empty cans
partially empty
Get Comp Sign
industrial fillers

* Request Waste Generation Rate

(91)

these storage area
Aerosol Can Machine
Bulking Machine
Permitted Areas

* Air Permit
Aerosol Can Machine
Shredding Machine

Aerosol - 820 App # 50050
ID # 0311833ACB
0311830002 - STATE CODE

Shredding Machine
ES 09 000 1
ID 0311833MCB

92

No City Discharge
Only Sanitary
sewer
one sewer in
Repair Garage

1 TO Be Hooked
up in American
Recycling

No permit violation

2 - Odor Complaints
SINCE FACILITY
HERE

FIRE IN 1987

93

MONITORING WELLS
IN PLACE
REMOVAL OF TWO
USTS AT LOADING
DOCK

LOADING DOCK WAS
REMOVED WITHOUT
CLOSURE PLAN

TWO USTS REMOVED
BEFORE BEING USED
ARGUMENT 1ST & 1ST

PRODUCED CLOSURE
PLAN - ALLEDGED
CONTAMINATION

(94)

(95)

IEPA KEPT TAKING SOIL SAMPLES. 4 DEEP 6 SHALLOW
PRODUCED A DID QUARTERLY
RANDOM DISTRIBUTION
OF CONTAMINANTS NOW ANNUAL SAMPLING
— NO PLUME GW FLOWS EAST
+ UNDER FACILITY
WORKING ON TO SOUTH WEST
GW PROGRAM FOR
THE LAST 5 YRS. UST'S DID COLLECT
SOME RAIN WATER
VERSAR DID
REPORT + STATES BELLWOOD WELLS
FACILITY DID NOT @ 1200 FEET DEEP
CONTRIBUTE
DES PLAINES RIVER
FACILITY CONTENDS ABOUT 2 MILES
THE ARE NOT AWAY
RESPONSIBLE

(96)

COMBINED SEWER TO 1ST AVENUE TO MSD INTERCEPTOR TO I-55

1055 FACILITY TOUR

Photo N1
Non hazardous Storage American Resource Recovery - Drums on Concrete
120 Drums
some cracks in Concrete 40 by 50

(97)

Photo E DRUM STORAGE AREA - 40 DRUMS

Photo E
HAZARDOUS ART ON CONCRETE
DRUMS ON PALLETTS

Some DRUMS IN OVERPACK
~~D003~~ CMC D001
~~D004~~ CMC D005, D235
D018 D002 D220
6 DRUMS
+4 +4 +6 +2
+4 8613

(98)

F093 19
7/23/93

HAZARDOUS
CONCRETE AREA
SOME OIL TYPE
STAIN

1-55-GAL ON
PALLET - CAUSTIC
USED TO CLEAN

~12" CONCRETE

2 CONCRETE
SUMPS

(99)

NON HAZARDOUS
SHREDDER MACHINE
30 CY ROLL OFF
IN CONCRETE
DIKE ABOUT
1' - TALL ON 3 SIDES

PHOTO E
NON HAZARDOUS
SHREDDER IN
RAIN WATER
PHOTO N

PROCESSING
AREA - DECIDE WHAT
TO DO DRUMS
ON PALLETTS
NO LONGER THAN
24 - hrs

CONCRETE AREA
ON WOODEN
PALLETS
DOOR 4 + 8 CANS
AEROSOL CANS +4
24
24 +

LABEL WITH RECEIVED
DATE 9/20/93

NO SIGNS OF LEAKS

PHOTO WEST
CONCRETE AREA
WAS BELOW
GRADE
CLOSED LOADING
+ UNLOADING

SHREDDER 85-86
CAN CRUSHER 86-87
GENERAL OPERATING 1986

CAN SHREDDER
IN TO CONVEYOR
CUT CAN OPEN
(PUNCTURE) - PROCESS
EMPTIES TO SUMP
UNDER
CAN TO CONVEYOR TO
CRUSHER TO ROLL OFF
2- MIST IMPINGING
FILTERS - JUST
PRIOR TO EXIT TO
STACK
EQUIPPED W FIRE
CONTROL

(102)

SUMP STEEL W PLASTIC COATING IN CONCRETE 350 GAL EQUIPPED WITH A HIGH LEVEL ALARM

PHOTO N SUMP CMC

PHOTO NW SCRUSHER 30 CY - ROLL OFF BOX FOR SCRAP METAL

PHOTO W ROLL OFF SOME GREASY PERFUMY STAINS

(103)

PHOTO S CMC LOADING & UNLOADING CONCRETE AREA IS DIKED

THEY DONT ACCEPT CFC'S

PHOTO N LOCATION OF FORMER USTs

TO SOUTH SARGENT CATERING

PHOTO E WELL

SURROUNDED BY 4 FOOT FENCE

(104)

W/ITH. BARBED
W/IRE

11:55 TOUR
OVER